

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS )  
LIABILITY LITIGATION )  
— )  
\_\_\_\_\_ )

THIS DOCUMENT RELATES TO: )

All Cases )  
)

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

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**SECOND AMENDED NOTICE OF 30(B)(6) DEPOSITION BY WRITTEN QUESTIONS**

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Defendants Box Hill Surgery Center, LLC, Ritu T. Bhambani, MD, and Ritu T. Bhambani, MD, LLC (Hereinafter “Box Hill”), pursuant to Fed. R. Civ. P. 31 and 30(b)(6), come now and give notice that the deposition of Annapolis Surgery Center, as an organization, will be taken by written questions.

Pursuant to Fed. R. Civ. P. 30(b)(6) and 31(a)(4), Annapolis Surgery Center shall designate a witness to testify regarding the written questions included with this notice, and any cross questions, redirect questions, or recross questions submitted in accordance with Fed. R. Civ. P. 31(a)(5).

The deponent will testify before a court reporter from Discovery Litigation Services at Annapolis Surgery Center, 2629 Riva Road, #106, Annapolis, Maryland 21401 on **March 11, 2016 at 1:30 PM**. The deposition will be recorded by video and stenographical means.

Respectfully submitted,

/s/ Gregory K. Kirby

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LLC*

**CERTIFICATE OF SERVICE**

I, Gregory K. Kirby, hereby certify that:

1. A copy of the forgoing document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system, including the attorneys representing the Plaintiffs in suits against Box Hill
2. Notice of Electronic Filing (NEF) will be sent to those parties by operation of CM/ECF system
3. A copy of the document will be served by U.S. Mail to Annapolis Surgery Center, 2629 Riva Road, Suite 106, Annapolis, MD 21401

on March 7, 2016.

/s/ Gregory K. Kirby

Gregory K. Kirby